



Louisville Metro Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0144-20-F

Plant ID: 0144

Effective Date: 05/28/2020

Expiration Date: 05/31/2025

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Source: Marcus Paint Company
235 East Market Street
Louisville, KY 40202

Owner: Marcus Paint Company, Inc.
235 East Market Street
Louisville, KY 40202

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve months and no later than ninety days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant:	VOC	Total HAP	Single HAP
Tons/year:	<25 tpy	<12.5 tpy	<5 tpy

Application No.:

See **Application and Related Documents** table.

Public Notice Date:

04/24/2020

Permit writer: Ulalo Chirwa



Air Pollution Control Officer
5/28/2020

Table of Contents

Permit Revisions and Changes.....	3
Application and Related Documents	3
Abbreviations and Acronyms	4
Preamble	5
General Conditions	5
Emission Unit U1: Paint Manufacturing System.....	9
U1 Applicable Regulations	9
U1 Equipment	9
U1 Control Devices.....	11
U1 Specific Conditions	12
S1.Standards.....	12
S2. Monitoring and Record Keeping	13
S3. Reporting.....	14
Insignificant Activities.....	16

Permit Revisions and Changes

Permit No.	Public Notice Date	Issue Date	Change Type	Description/Scope
124-03-F	04/13/2003	05/30/2003	Initial	Initial Permit Issuance
O-0144-14-F	12/06/2014	04/07/2015	Renewal	Renewal
O-0144-14-F (R1)	06/11/2015	07/21/2015	Revision	Remove Federal Regulation 40 CFR 63 Subpart CCCCCC, because it is not applicable
O-0144-20-F	04/24/2020	05/28/2020	Renewal	Renewal

Application and Related Documents

Document Handle	Date	Description
128974	01/23/2020	FEDOOP Renewal Application
135321	03/17/2020	Administratively complete letter
135729	03/24/2020	Source correspondence providing potential PM emissions

Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors, published by U.S.EPA</i>
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
(M)SDS	- (Material) Safety Data Sheet
NAICS	- North American Industry Classification System
NO _x	- Nitrogen oxides
PM	- Particulate Matter
PM ₁₀	- Particulate Matter less than 10 microns
PM _{2.5}	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

- G1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
- G2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
- G3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
- G4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.
- G5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
- G6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.

- G7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
- G8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.
- G9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
- G10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM₁₀, PM_{2.5}, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; or any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.
- G11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
- G12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All compliance reports shall include the following per Regulation 2.17, section 3.5.
- A certification statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete", and
 - The signature and title of a responsible official of the company.

The annual report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.

- G13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emission Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
1.18	Rule Effectiveness
1.19	Administrative Hearings
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.06	Permit Requirements – Other Sources
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
3.01	Ambient Air Quality Standards
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.04	Particulate and Sulfur Dioxide Reduction Requirements
4.05	Hydrocarbon and Nitrogen Oxides Reduction Requirements
4.06	Carbon Monoxide Reduction Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

- G14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
2.17	Federally Enforceable District Origin Operating Permits
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards

- G15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
- G16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
- G17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District
701 W. Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137***

Emission Unit U1: Paint Manufacturing System

Paint Manufacturing System, specifically: four (4) Red Head sand mills, eight (8) high-speed dispersers, one (1) test panel spray booth area, eight (8) product storage tanks, eight (8) product process tanks, fifty-one (51) portable process tanks¹

U1 Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
6.09	Standards of Performance for Existing Process Operations	1 through 3
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1 through 5
6.24	Standard of Performance for Existing Sources Using Organic Materials	1 through 5

U1 Equipment

Emission Point	Description	Applicable Regulations	Control ID	Release ID
E1	Red Head Sand Mill, 16 gal	6.09 & 6.24	N/A	N/A
E2	Red Head Sand Mill, 16 gal		N/A	N/A
E3	Red Head Sand Mill, 3 gal		N/A	N/A
E4	Red Head Sand Mill, 3 gal		N/A	N/A
E5	High-Speed Disperser Twin, 30HP	6.09 & 6.24	C1	S1
E6	High-Speed Disperser, 25 HP		C1	S1
E7	High-Speed Disperser, 25 HP		C1	S1
E8	High-Speed Disperser, 15 HP		C1	S1
E9	High-Speed Disperser, 15 HP		C1	S1
E10	High-Speed Disperser, 15 HP		C1	S1
E11	High-Speed Disperser, 20 HP		C1	S1

¹ Portable Process Tanks (E31 – E47) are not stored in the production area between batches. Specific tanks are used based on batch size and placed under a mixer so that product can be added under agitation.

Emission Point	Description	Applicable Regulations	Control ID	Release ID
E12	High-Speed Dispenser, 2 HP		C1	S1
E13	High-Speed Dispenser, 2 HP		C1	S1
E14	Test Panel Spray Booth	6.09 & 6.24	C2	S2
E15	Storage Tank, 1300 gal	6.13	N/A	N/A
E16	Storage Tank, 1300 gal		N/A	N/A
E17	Storage Tank, 1300 gal		N/A	N/A
E18	Storage Tank, 1300 gal		N/A	N/A
E19	Storage Tank, 1300 gal		N/A	N/A
E20	Storage Tank, 1300 gal		N/A	N/A
E21	Storage Tank, 1300 gal		N/A	N/A
E22	Storage Tank, 1300 gal		N/A	N/A
E23	Process Tank, 1100 gal	6.24	N/A	N/A
E24	Process Tank, 1100 gal		N/A	N/A
E25	Process Tank, 1300 gal		N/A	N/A
E26	Process Tank, 1300 gal		N/A	N/A
E27	Process Tank, 4000 gal		N/A	N/A
E28	Process Tank, 4000 gal		N/A	N/A
E29	Process Tank, 4000 gal		N/A	N/A
E30	Process Tank, 4000 gal		N/A	N/A
E31	Portable Process Tank, 4563 gal	6.24	N/A	N/A
E32	Portable Process Tank, 4199 gal		N/A	N/A
E33	Portable Process Tank, 2281 gal		N/A	N/A
E34	Portable Process Tank, 2281 gal		N/A	N/A
E35	Portable Process Tank, 1328 gal		N/A	N/A
E36	Portable Process Tank, 1328 gal		N/A	N/A
E37	Portable Process Tank, 1106 gal		N/A	N/A

Emission Point	Description	Applicable Regulations	Control ID	Release ID
E38	Portable Process Tank, 1106 gal	6.24	N/A	N/A
E39	Portable Process Tank, 604 gal		N/A	N/A
E40	Portable Process Tank, 390 gal		N/A	N/A
E41	Portable Process Tank, 390 gal		N/A	N/A
E42	Portable Process Tank, 390 gal		N/A	N/A
E43	Portable Process Tank, 374 gal		N/A	N/A
E44	Portable Process Tank, 372 gal		N/A	N/A
E45	Portable Process Tank, 343 gal		N/A	N/A
E46	Portable Process Tank, 315 gal		N/A	N/A
E47	Portable Process Tank, 315 gal		N/A	N/A
E48	Portable Process Tank, 311 gal	6.24	N/A	N/A
E49	Portable Process Tank, 278 gal		N/A	N/A
E50	Portable Process Tank, 275 gal		N/A	N/A
E51	Portable Process Tank, 268 gal		N/A	N/A
E52	Portable Process Tank, 268 gal		N/A	N/A
E53	Portable Process Tank, 268 gal		N/A	N/A
E54	Portable Process Tank, 263 gal		N/A	N/A
E55-E81	Various Portable Process Tanks, <250 gal		N/A	N/A

U1 Control Devices

Control ID	Description	Control Efficiency	Stack ID
C1	Torit Dust Collector	95%	S1
C2	Dry Filters	--	S2

U1 Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. HAP

- i. The owner or operator shall not allow or cause the plantwide emissions of any single HAP to equal or exceed 5 tons during any consecutive 12-month period.² [Regulation 5.00, section 1.13.5.2]
- ii. The owner or operator shall not allow or cause the plantwide total HAP emissions to equal or exceed 12.5 tons during any consecutive 12-month period.² [Regulation 5.00, section 1.13.5.3]
- iii. The owner or operator shall not use any material containing benzene, methylene chloride, or compounds of cadmium, chromium, lead, and/or nickel in amounts greater than or equal to 0.1 percent by weight for carcinogens, or 1.0 percent by weight for non-carcinogens, as shown in formulation data provided by the manufacturer or supplier, such as the Safety Data Sheet for the material. Benzene and methylene chloride are volatile HAP. Compounds of cadmium, chromium, lead and/or nickel are metal HAP.³

b. Opacity

For Emission Points E1 through E14, the owner or operator shall not allow visible emissions to equal or exceed 20 % opacity.
[Regulation 6.09, section 3.1]

c. PM/PM₁₀/PM_{2.5}

For Emission Points E1 through E14⁴, the owner or operator shall not allow PM emissions to exceed 2.58 lb/hr per piece of equipment based on actual operating hours in a calendar day.⁵ [Regulation 6.09, section 3.2]

d. VOC

- i. For Emission Points E1 through E14, E23 through E81:
 - 1) The owner or operator shall not discharge into the atmosphere more than forty (40) pounds of VOC in any one day, nor more than eight

² On 5/14/14, source requested the limits of the criteria pollutant VOC < 25 tpy, Total HAPs < 12.5 tpy and largest single HAP < 5.0 tpy to qualify as FEDOOP exempt from STAR, as defined by Regulation 5.00, section 1.13.5.

³ The equipment or processes covered by this permit are not currently subject to the standards of the NESHAP, 40 CFR 63 subpart CCCCCC, due to the absence of the aforementioned chemicals in the paints. On 5/28/2010 and 6/5/2015 a request was made to exclude 40 CFR 63 subpart CCCCCC requirements from the permit.

⁴ Emission Point E14 is used to spray sample panels for quality control of each batch. A sample panel is approximately 3" x 5". The estimated paint usage is conservatively estimated at 1.5 fluid ounces per panel. The District has determined, based on solids content, transfer efficiency and a conservative maximum of 0.5 gallon per hour spraying capacity, that the uncontrolled PM emissions of 1.32 lb/hr do not exceed the 2.58 lb/hr limit.

⁵ A one-time PM compliance demonstration for this equipment was performed and the lb/hr standard cannot be exceeded uncontrolled.

(8) pounds in any one hour, from any existing affected facility in which any Class II solvent is used. [Regulation 6.24, section 3.2]

2) The owner or operator shall not discharge into the atmosphere more than three thousand (3,000) pounds of VOC in any one day, nor more than four hundred fifty (450) pounds in any one hour, from any existing affected facility in which any Class III solvent or any material containing such solvent is employed or applied. [Regulation 6.24, section 3.3]

ii. Each Emission Point E15, E16, E17, E18, E19, E20, E21 and E22 (storage tanks) shall be equipped with a permanent submerged fill pipe.⁶ [Regulation 6.13, section 3.3]

iii. The owner or operator shall not allow or cause the plantwide emissions of VOC to equal or exceed 25 tons during any consecutive 12-month period.⁷ [Regulation 2.17, section 5.1] [Regulation 5.00, section 1.13.5.1]

S2. **Monitoring and Record Keeping**

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. **HAP**

The owner or operator shall monthly calculate and record the monthly and consecutive 12-month plantwide emissions of each single HAP and total HAP for each month in the reporting period.

b. **Opacity**

i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of the Emission Points E1 through E14. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.

iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person

⁶ All of the storage tanks are atmospheric tanks equipped with submerged fill pipe. Therefore, records are not required for change of contents and/or vapor pressure of materials stored.

⁷ On 5/14/14, source requested the limits of the criteria pollutant VOC < 25 tpy, Total HAPs < 12.5 tpy and largest single HAP < 5.0 tpy to qualify as FEDOOP exempt from STAR, as defined by Regulation 5.00, section 1.13.5.

conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

c. **PM/PM₁₀/PM_{2.5}**

For Emission Points E1 through E14, the owner or operator shall, monthly, perform visual inspection of the structural and mechanical integrity of the dust collectors for signs of damage, air leakage, corrosion, or other equipment defects, and repair and/or replace defective components as needed. The owner or operator shall maintain monthly records of the results.

d. **VOC**

i. For Emission Points E1 through E14, E23 through E81, the owner or operator shall maintain the following records:

- 1) The hours of operation of the equipment or usage for each day;
- 2) The daily amount used in gallons of each solvent, cleaner, etc;
- 3) Monthly calculations and records of the Class II VOC emissions in pounds (lb) per day and pounds (lb) per hour, using the number or operating days in the calendar month and the number of operating hours each day; and
- 4) Monthly calculations and records of the Class III VOC emissions in pounds (lb) per day and pounds (lb) per hour, using the number or operating days in the calendar month and the number of operating hours each day.

ii. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month plantwide VOC emissions for each month in the reporting period.

S3. **Reporting**

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. **HAP**

The plantwide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

b. **Opacity**

- i. The number of surveys where visible emissions were observed;
- ii. The date, time, and results of each Method 9 that exceeded the opacity standard; and
- iii. Description of any corrective action taken for each exceedance.

c. **PM/PM₁₀/PM_{2.5}**

There are no routine compliance reporting requirements for this equipment.

d. **VOC**

- i. The owner or operator shall report the highest pound per day (lb/day) and pound per hour (lb/hour) VOC emissions from Class II solvents for each month in the report period;
- ii. The owner or operator shall report the highest pound per day (lb/day) and pound per hour (lb/hour) VOC emissions from Class III solvents for each month in the report period; and
- iii. The total plantwide consecutive 12-month VOC emissions for each month in the reporting period.

Insignificant Activities

Equipment	Qty.	Regulation Basis
Natural Gas Boiler, 0.5 MMBtu/hr	1	Regulation 1.02, Appendix A, section 1.1
Emergency relief vents, stacks and ventilating systems	1	Regulation 1.02, Appendix A, section 3.10
Laboratory ventilating and exhausting system which are not used for radioactive air contaminants	2	Regulation 1.02, Appendix A, section 3.11
Research and Development (R&D) Lab Equipment: Six (6) air-powered lab mixers, two (2) Electric lab mixers, two (2) electric oven for curing test panels coated in the lab and one (1) gas-fired oven for curing test panels coated in the lab	-	Regulation 1.02, Appendix A, section 3.27

1. Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
2. Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
3. The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.
4. Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
5. The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
6. The District has determined that no monitoring, recordkeeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.